

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES SECURITIES AND
EXCHANGE COMMISSION

Plaintiff,

v.

MARK A. MILLER, SAEID
JABERIAN, and CHRISTOPHER J.
RAJKARAN,

Defendants.

Case No. 21-CV-01445 (DSD/ECW)

JOINT MOTION TO VACATE THE TRIAL-READY DATE

Plaintiff United States Securities and Exchange Commission (“SEC” or “Commission”) and Defendant Saeid Jaberian (“Jaberian”) (collectively, the “Parties”) submit the following Joint Motion to Vacate the Trial-Ready Date. The SEC staff and Jaberian have reached a settlement in principle and agree that the trial-ready date should be vacated while SEC counsel seeks approval of the settlement by the Commission.

1. The SEC filed the Amended Complaint on November 1, 2021. (Dkt. No. 20.) The case was stayed shortly thereafter until the resolution of the parallel criminal case, *United States v. Miller, et al.*, No. 21 CR 142. (Dkt. No. 29.)

2. The stay was lifted in 2023 and, on August 21, 2024, the Court set a trial-ready date of August 6, 2025. (Dkt. No. 90.)

3. Since then, the SEC's claims against Defendants Mark Miller and Christopher Rajkaran have been resolved by this Court through the entry of final judgments. (Dkt. Nos. 113, 128-129.)

4. The SEC then moved for partial summary judgment against Defendant Saeid Jaberian, the last remaining defendant, based upon his criminal conviction in the parallel criminal case and, on April 9, 2025, the Court granted the SEC's motion. (Dkt. No. 139.)

5. The SEC staff and Defendant Jaberian have now reached a settlement in principle. However, the proposed settlement must still be approved by the Commission. That process is expected to take approximately two to three months and, at all events, will likely occur after this matter is trial ready on August 6, 2025.

6. As a result, to conserve resources and promote judicial economy, the Parties jointly move the Court to vacate the August 6, 2025 trial-ready date.

For the foregoing reasons, the Parties respectfully and jointly request that this Court grant their motion to vacate the trial-ready date of August 6, 2025, and enter the Proposed Order, attached hereto as Exhibit 1.

Dated: June 30, 2025

Respectfully submitted,

**UNITED STATES SECURITIES
AND EXCHANGE COMMISSION**

By: /s/ Alyssa A. Qualls

Alyssa A. Qualls (quallsa@sec.gov)
United States Securities and Exchange Commission
Chicago Regional Office
175 West Jackson Boulevard, Suite 1450
Chicago, Illinois 60604
(312) 353-7390

Saeid Jaberian
Minneapolis, Minnesota 55305
perspolisjon1@gmail.com
(612) 251-2727

Defendant Jaberian, Pro Se

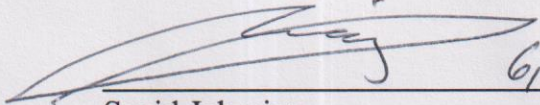
Dated: June __, 2025

Respectfully submitted,

**UNITED STATES SECURITIES
AND EXCHANGE COMMISSION**

By: /s/ Alyssa A. Qualls

Alyssa A. Qualls (quallsa@sec.gov)
United States Securities and Exchange Commission
Chicago Regional Office
175 West Jackson Boulevard, Suite 1450
Chicago, Illinois 60604
(312) 353-7390



6/28/2025

Saeid Jaberian
Minneapolis, Minnesota 55305
perspolisjon1@gmail.com
(612) 251-2727

Defendant Jaberian, Pro Se

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 30, 2025, I served the foregoing
Joint Motion to Vacate the Trial-Ready Date upon the following by email delivery:

Saeid Jaberian

Minneapolis, Minnesota 55305
perspolisjon1@gmail.com
(612) 251-2727

Defendant Jaberian, Pro Se

/s/ Alyssa A. Qualls